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10 *Attorneys for Plaintiff*

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12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 JENNIE QUAN, individually and as  
15 successor in interest to BENJAMIN  
16 CHIN, deceased,

17 Plaintiffs,

18 vs.

19 COUNTY OF LOS ANGELES;  
20 MARISOL BARAJAS; HECTOR  
21 VAZQUEZ; and DOES 3-10, inclusive,

22 Defendants.

23 Case No. 2:24-cv-04805-MCS-KS

24 *Assigned to:*  
25 Hon. Mark C. Scarsi  
26 Hon. Mag. Judge Karen L. Stevenson

27 **DECLARATION OF HANG D. LE IN  
28 SUPPORT OF PLAINTIFF'S  
MOTIONS IN LIMINE NOS. 1-4**

1 Final Pretrial Conference:  
2 Date: January 26, 2026  
3 Time: 2:00 p.m.  
4 Crtrm: 7C

5 Trial:  
6 Date: February 10, 2026

1 I, Hang D. Le, hereby declare as follows:

2 1. I am an attorney duly licensed to practice law in the United States  
3 District Court for the Central District of California. I make this Declaration in  
4 Support of Plaintiff's Motions in Limine Nos. 1-4. I have personally familiar with the  
5 matters stated herein and could testify competently thereto if called.

6 2. Attached hereto as "**Exhibit 1**" is a true and correct copy of the Rule 26  
7 Report of County Defendants' human factors expert, Joel Suss, Ph.D.

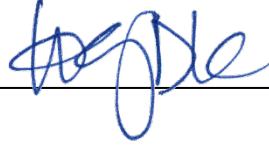
8 3. Attached hereto as "**Exhibit 2**" is a true and correct copy of the relevant  
9 portions of the Deposition of Joel Suss, Ph.D.

10 4. Attached hereto as "**Exhibit 3**" is a true and correct copy of the Rule 26  
11 Report of County Defendants' police practices expert, Edward T. Flosi.

12 5. Attached hereto as "**Exhibit 4**" is a true and correct copy of the relevant  
13 portions of the Deposition of Edward T. Flosi.

14 6. Attached hereto as "**Exhibit 5**" is a true and correct copy of the Rule 26  
15 Report of County Defendants' rebuttal neurologist expert, John Marchbian, MD.

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17 I declare under penalty of perjury under the laws of the State of California and the  
18 United States of America that the foregoing is true and correct. Executed this 5th day  
19 of January 2026, in Los Angeles, California.

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